

## **Exhibit 2**

**From:** [Whitehead, Jamal](#)  
**To:** [BeerN@gtlaw.com](#); [DESmith@littler.com](#); [joan@3brancheslaw.com](#)  
**Cc:** [ellisond@gtlaw.com](#); [schipmas@gtlaw.com](#); [Berger, Adam](#); [Halm, Lindsay](#); [devin@sunbird.law](#); [andrew@immigrantcivilrights.com](#); [meena@meenamenter.com](#); [Cronan, Sheila](#); [muenzfeldd@gtlaw.com](#)  
**Subject:** RE: Nwauzor v. GEO - Protective Order  
**Date:** Tuesday, January 8, 2019 6:48:00 PM

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Will do.

---

**Jamal N. Whitehead**

Schroeter Goldmark & Bender

810 Third Avenue Suite 500

Seattle, WA 98104

Tel: 206.622.8000

[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com) | [sgb-law.com](http://sgb-law.com)

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**From:** BeerN@gtlaw.com [mailto:BeerN@gtlaw.com]  
**Sent:** Tuesday, January 8, 2019 6:10 PM  
**To:** Whitehead, Jamal; DESmith@littler.com; joan@3brancheslaw.com  
**Cc:** ellisond@gtlaw.com; schipmas@gtlaw.com; Berger, Adam; Halm, Lindsay; devin@sunbird.law; andrew@immigrantcivilrights.com; meena@meenamenter.com; Cronan, Sheila; muenzfeldd@gtlaw.com  
**Subject:** Re: Nwauzor v. GEO - Protective Order

Thanks Jamal. Good to file. Can you put Scott's name for the signature for GEzo?

Naomi Beer  
Greenberg Traurig LLP  
Office: 303.572.6549  
Cell: 303.810.5821  
BeerN@gtlaw.com

----- Original message -----

From: "Whitehead, Jamal" <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>  
Date: 1/8/19 6:54 PM (GMT-07:00)  
To: "Beer, Naomi (Shld-Den-LT-Labor-EmpLaw)" <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>, [DESmith@littler.com](mailto:DESmith@littler.com), [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
Cc: "Ellison, Dawn (OfCnsl-DC-LT)" <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>, "Schipma, Scott A. (Shld-DC-GvtCntr)" <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>, "Berger, Adam" <[berger@sgb-law.com](mailto:berger@sgb-law.com)>, "Halm, Lindsay" <[halm@sgb-law.com](mailto:halm@sgb-law.com)>, [devin@sunbird.law](mailto:devin@sunbird.law), [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com), [meena@meenamenter.com](mailto:meena@meenamenter.com), "Cronan, Sheila" <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>, "Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr)" <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>  
Subject: RE: Nwauzor v. GEO - Protective Order

Thanks, Naomi. We accept your edits and have nothing further to add. Do I have your permission to file? Whose signature should I affix to the signature block for GEO?

---

**Jamal N. Whitehead**

Schroeter Goldmark & Bender

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---

**From:** BeerN@gtlaw.com [mailto:BeerN@gtlaw.com]

**Sent:** Tuesday, January 08, 2019 5:40 PM

**To:** Whitehead, Jamal; DESmith@littler.com; joan@3brancheslaw.com

**Cc:** ellisond@gtlaw.com; schipmas@gtlaw.com; Berger, Adam; Halm, Lindsay; devin@sunbird.law; andrew@immigrantcivilrights.com; meena@meenamenter.com; Cronan, Sheila; muenzfeldd@gtlaw.com

**Subject:** RE: Nwauzor v. GEO - Protective Order

Thanks Jamal. This is very close. The attached draft accepts your last changes and makes a few tweaks shown in redline. Per our discussion just now, I also revised the last paragraph about the opt-out report to be filed with the court since anything with names would need to be filed under seal (my revisions make that paragraph a little more generic). I also deleted all of the comments, cleaned up a few of the fonts (there was jumping back and forth between 12 and 13 point font, and also a place where the text was in red).

I have to leave the office but can be reached by email or cell (303.810.5821) if you have any further questions.

Naomi

**Naomi G. Beer**

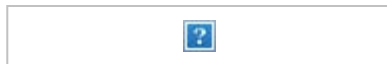
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---

**From:** Whitehead, Jamal [mailto:whitehead@sgb-law.com]

**Sent:** Tuesday, January 8, 2019 5:48 PM

**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <BeerN@gtlaw.com>; DESmith@littler.com; joan@3brancheslaw.com

**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <ellisond@gtlaw.com>; Schipma, Scott A. (Shld-DC-GvtCntr) <schipmas@gtlaw.com>; Berger, Adam <berger@sgb-law.com>; Halm, Lindsay <halm@sgb-

law.com>; devin@sunbird.law; andrew@immigrantcivilrights.com; meena@meenamenter.com; Cronan, Sheila <cronan@sgb-law.com>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <muenzfeldd@gtlaw.com>

**Subject:** RE: Nwauzor v. GEO - Protective Order

Naomi,

Attached is another revised draft of the Notice Plan. As before, I accepted all the changes made to the plan found in the version contained in your 1:17 p.m. (PST) email, and have modified paragraph 5.c.i in line with our discussion a short while ago. Feel free to give me a call again at 206.233.1201 if you'd like to discuss this further, but I think the proposed language addresses both parties' concerns as expressed during our call.

Best,  
Jamal

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**Jamal N. Whitehead**

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206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** Whitehead, Jamal

**Sent:** Tuesday, January 08, 2019 2:59 PM

**To:** 'BeerN@gtlaw.com'; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)

**Subject:** RE: Nwauzor v. GEO - Protective Order

Naomi,

I've reviewed GEO's revisions to the proposed notice plan and accepted many of your edits via track changes. I've revised paragraph 5.c.i, however, to match what I articulated earlier today during our call—GEO has basic information about the class in its possession, including the name and country of origin of VWP participants, that is *not* subject to ICE review or approval that should be produced to Class Counsel soon after the entry of a protective order. My changes allow for the balance of the class list information to follow once ICE approval is obtained. Please let me know if this change meets with GEO's approval.

Time is growing short to file, so feel free to give me a call if you'd like to talk this change over further.

Best,  
Jamal

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**Jamal N. Whitehead**

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---

**From:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com) [mailto:[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)]

**Sent:** Tuesday, January 08, 2019 1:16 PM

**To:** Whitehead, Jamal; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)

**Subject:** RE: Nwauzor v. GEO - Protective Order

Jamal,

Thanks for the call earlier this morning. Attached is a revised draft adding in some proposed deadlines for the provision of class list information, and also streamlining some other areas (in particular the publication piece to remove all the detail). We also revised the references to “Class Counsel” to instead read “Notice Administrator” and also added in some language about approving the notice administrator. We also added in a timetable for review of the banner/display ads which have not yet been provided and which, I expect, may be another “chicken and egg” issues like we discussed this morning. We also cleaned up the timing in the last paragraph – if that is not what you intended, just let us know .

The attached redlines are off of the clean draft with comments that I had sent yesterday, but we kept in the comments as a reminder of the questions that we had flagged.

Please let us know your thoughts on the attached. I’m generally around this afternoon if we need to jump back on a call.

Thanks,  
Naomi

**Naomi G. Beer**

Co-Chair, Global Labor & Employment Practice

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---

**From:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw)  
**Sent:** Monday, January 7, 2019 2:17 PM  
**To:** 'Whitehead, Jamal' <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>  
**Subject:** RE: Nwauzor v. GEO - Protective Order

That works on our end.

Will you send out a dial in?

---

**From:** Whitehead, Jamal [<mailto:whitehead@sgb-law.com>]  
**Sent:** Monday, January 7, 2019 12:59 PM  
**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>  
**Subject:** RE: Nwauzor v. GEO - Protective Order

Naomi, thanks for a quick turnaround. How about a call tomorrow morning at 9:00 a.m. (PST)?

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**Jamal N. Whitehead**

[Schroeter Goldmark & Bender](#)

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---

**From:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com) [<mailto:BeerN@gtlaw.com>]  
**Sent:** Monday, January 07, 2019 11:26 AM  
**To:** Whitehead, Jamal; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)  
**Subject:** RE: Nwauzor v. GEO - Protective Order

Jamal,

Thank you for sending the draft notice plan. Given that we did not receive it until late in the day on Friday, we have done our best to review the plan and provide comments as quickly as possible. At the outset, we were a little surprised in that it did not seem to be a high level plan with leeway for

both parties going forward as we had discussed on our call last Thursday and had a number of specifics that may ultimately be something that we can all agree to but we need additional information and need to have further discussions before GEO can fully take a position. We have made revisions in the attached to account for that including to identify items that we think must be the subject of further meet and confers between the parties followed by further submissions to the court. Our revisions also account for the impact of the government shutdown, which, as discussed on our call, impacts the ability to obtain certain class list information from the government. In addition, given that we only received this late Friday, we have not been able to fully review Exhibits A, B and C that were at the back of your word document, and our revisions include a schedule for us to provide comments on those and after that submit the notice documents to the court for approval. We also do not think that this should be a joint submission and we have revised with that in mind. The attachments to this email include a clean revised draft (without Exhibits A, B and C) that reflects proposed revisions and includes comments/annotations about our questions, and a redline comparison document in pdf which shows the revisions made to the document that you had provided (note that the comments do not show on the redline pdf).

With respect to class notice specifically, we have deleted the language in your draft regarding the actual content of the class notice. I have cut and pasted that language below and highlighted in green what items are available to GEO, and highlighted in yellow the items that are only possessed by ICE – as you can see, a significant portion of what you are looking for sits with ICE, not GEO:

their last known home address, country of citizenship, home country, detention status, and alien number (which shall only be used to identify correct addresses if necessary). The alien numbers shall be kept strictly confidential by class counsel. In addition, Defendant shall provide to Class Counsel a complete list of counsel, if any, representing the Class Members in any underlying immigration proceedings, including the following contact information for such counsel: mailing address, e-mail, and telephone number.

You will also see in the comments that we have a number of overarching questions about how you envision the role of the Notice Administrator versus the role of Class Counsel in the notice process – it seems to us that the Notice Administrator should be handling many of these tasks (such as mailing, handling opt-outs, etc.), but you drafted it such that Class Counsel will be doing that. You also did not identify who the notice administrator will be – who do you propose to use? We would also expect that they have a view on the plan as proposed?

Given that this is due tomorrow, it may be helpful to have a call to discuss finalizing. What is your availability Tuesday morning?

On another note, I have also attached a proposed 502(d) order and related motion – it is my understanding that these documents were previously approved by Plaintiffs' counsel during discussion with Norton Rose but were not actually submitted to the court. The signature blocks will need to be updated to add GT and Littler, but from a substantive perspective we would expect these are final. Please let us know at your earliest convenience if the 502(d) Order and related motion are OK to file with the Court.

We also look forward to seeing your further revisions to the Protective Order as soon as you are able to send them.

Thanks,  
Naomi

**Naomi G. Beer**

Co-Chair, Global Labor & Employment Practice

Greenberg Traurig, LLP

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**From:** Whitehead, Jamal [<mailto:whitehead@sgb-law.com>]

**Sent:** Friday, January 4, 2019 5:33 PM

**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>

**Subject:** RE: Nwauzor v. GEO - Protective Order

Naomi, et al.

Attached is a draft of the proposed Notice Plan.

We will have updated comments for you on the proposed Protective Order early next week.

Please send us the proposed 502(d) as soon as you're able. Thank you.

Best,  
Jamal

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**Jamal N. Whitehead**

Schroeter Goldmark & Bender

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---

**From:** BeerN@gtlaw.com [mailto:BeerN@gtlaw.com]

**Sent:** Thursday, January 03, 2019 5:40 PM

**To:** Whitehead, Jamal; DESmith@littler.com; joan@3brancheslaw.com

**Cc:** ellisond@gtlaw.com; schipmas@gtlaw.com; Berger, Adam; Halm, Lindsay; devin@sunbird.law; andrew@immigrantcivilrights.com; meena@meenamenter.com; Cronan, Sheila; muenzfeldd@gtlaw.com

**Subject:** RE: Nwauzor v. GEO - Protective Order

Jamal and Devin,

Thanks for taking the time to talk with us today about the Notice Plan, Protective Order, and 502(d) Order. Our understanding of the next steps are as follows:

- **Notice Plan:** You will provide us with a draft of the Notice Plan for our review and comment. Given the fact that the government shutdown has unfortunately impacted the timing of when class list information in the possession of ICE can be provided, it is anticipated that the Plan will be high-level and drafted in a way that provides leeway for both parties going forward (i.e., it permits Plaintiffs to supplement the Plan upon receipt of additional information regarding the class and for GEO to further comment or object to the Plan). Given the present deadline of January 8, 2019 to submit the Notice Plan to the court, we would appreciate it if you could provide the draft to us as soon as possible – we had discussed your sending it to us today, but if it is not feasible to provide it today, please provide it as early as possible on Friday.
- **Protective Order:**
  - You hold the pen on this and will provide GEO with additional and/or revised (as appropriate) comments and edits in light of our discussion today. In particular, you will: (1) review the types of documents that would be covered under a “Highly Confidential- Attorney’s Eyes Only Provision” and provide suggested changes thereto (e.g., which document types you are amenable to leaving under AEO and which you feel are more appropriate under a “Confidential” designation); and (2) discuss the security and data breach provisions with your team to determine what protections Plaintiffs are able to agree to. You will then share a further draft with us for our review and further comment. Once we can reach agreement, we will coordinate with ICE for the agency’s review of the Protective Order. The timing of this depends on the duration of the government shutdown.
  - GEO will review consider the suggested edits to 4.4 re: the filing of protected

material and will provide feedback once the next draft is turned to GEO.

- **502(d) Order:** GEO will provide you with a draft order for your consideration.

If I have missed or misstated anything, please just let me know.

Thanks again,

Naomi

**Naomi G. Beer**

Co-Chair, Global Labor & Employment Practice

Greenberg Traurig, LLP

1200 17th Street, Suite 2400 | Denver, Colorado 80202

T 303.572.6549 | F 720.904.7649 | C 303.810.5821

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---

**From:** Whitehead, Jamal [<mailto:whitehead@sgb-law.com>]

**Sent:** Monday, December 31, 2018 10:57 AM

**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>

**Subject:** RE: Nwauzor v. GEO - Protective Order

Yes, that works on my end. I'll send out a meeting invitation. Thanks and Happy New Year. -JW

---

**Jamal N. Whitehead**

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---

**From:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com) [<mailto:BeerN@gtlaw.com>]

**Sent:** Monday, December 31, 2018 8:22 AM

**To:** Whitehead, Jamal; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)

**Subject:** RE: Nwauzor v. GEO - Protective Order

Thanks Jamal. Would 9 pacific / 10 mtn / noon Eastern on Thursday, January 3 work for a call?

Naomi

**Naomi G. Beer**

Co-Chair, Global Labor & Employment Practice

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---

**From:** Whitehead, Jamal [<mailto:whitehead@sgb-law.com>]

**Sent:** Friday, December 28, 2018 3:41 PM

**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Muenzfeld, Danielle K. (Assoc-WDC-GvtCntr) <[muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)>

**Subject:** RE: Nwauzor v. GEO - Protective Order

Naomi,

Here's an edited copy of the proposed protective order with comments. Are you available for a call on Jan. 3 or 4 to discuss? My schedule is fairly flexible both days, so please let me know what works best for you.

I have some thoughts on a proposed notice plan, which I'd also like to discuss during our call.

Best,  
Jamal

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**Jamal N. Whitehead**

Schroeter Goldmark & Bender

206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

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**From:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com) [mailto:[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)]  
**Sent:** Sunday, December 23, 2018 5:14 AM  
**To:** Whitehead, Jamal; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)  
**Subject:** Re: Nwauzor v. GEO - Protective Order

Thanks Jamal. We could find some time for a call Dec 26, 27 or 28, but we think it would be more productive to get your comments on the protective back before a call. If you think you could do that, let us know and we could set a call for then. If not, can we aim to have comments back and then a call on Jan 2, 3 or 4?

Naomi Beer  
Greenberg Traurig LLP  
Office: 303.572.6549  
Cell: 303.810.5821  
[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)

---

**From:** [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)  
**Sent:** December 20, 2018 3:20 PM  
**To:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com); [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); [berger@sgb-law.com](mailto:berger@sgb-law.com); [halm@sgb-law.com](mailto:halm@sgb-law.com); [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); [cronan@sgb-law.com](mailto:cronan@sgb-law.com); [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)  
**Subject:** RE: Nwauzor v. GEO - Protective Order

Thank you, Naomi. I'll review this and get back to you as soon as I can.

As for a conference, are you in the office at all next week?

---

**Jamal N. Whitehead**  
Schroeter Goldmark & Bender  
[206.622.8000](tel:206.622.8000) | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** [BeerN@gtlaw.com](mailto:BeerN@gtlaw.com) [mailto:[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)]  
**Sent:** Thursday, December 20, 2018 10:43 AM  
**To:** Whitehead, Jamal; [DESmith@littler.com](mailto:DESmith@littler.com); [joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
**Cc:** [ellisond@gtlaw.com](mailto:ellisond@gtlaw.com); [schipmas@gtlaw.com](mailto:schipmas@gtlaw.com); Berger, Adam; Halm, Lindsay; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila; [muenzfeldd@gtlaw.com](mailto:muenzfeldd@gtlaw.com)  
**Subject:** RE: Nwauzor v. GEO - Protective Order

Jamal,

As a follow up to my below email, attached please find attached a revised draft of the protective order. As noted below, the draft, in relevant part, includes changes to align this order with certain aspects of the amended Protective Order entered in *Menocal*. These

changes include, but are not limited to, the addition of language regarding the Privacy Act and law enforcement sensitive information, as well as a “Highly Confidential-Attorneys’ Eyes Only” designation. We anticipate that the government (as it did in *Menocal*) will want to review the protective order after the parties have agreed to its terms, but before it is finalized and filed with the court. Accordingly, once we reach agreement with on terms of the order, we will circulate the draft to the government for its review.

Please advise as to your availability for a meet-and-confer on the attached.

Thanks,  
Naomi

**Naomi G. Beer**  
Co-Chair, Global Labor & Employment Practice

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**From:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw)  
**Sent:** Monday, December 17, 2018 9:44 AM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); Joan Mell  
<[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)> <[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)>  
**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay  
<[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com);  
[meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>  
**Subject:** RE: Nwauzor v. GEO - Protective Order

Jamal,

Thank you for following up. We are working on a revised draft of the protective order to, among other things, align with certain aspects of the Menocal order. We expect the government may, as it did in Menocal, also want to review any protective order before finalizing. We plan to circulate a draft to you early this week.

As to the class list, we note that we never received any response to the letter that Dawn Ellison had sent on September 14 on that subject. That being said, given the discussions in Menocal, we are working to pull together class list information similar to the information recently provided in Menocal to include (as it did in Menocal) information from GEO and information from the government. This undertaking is subject to the caveats that the facilities may not be identical in terms of the data available and also that GEO does not control how fast (or slowly)

the government will respond to its requests. We will report back on the progress of this data pull once we have additional information.

As you know, the deadline to submit a notice plan in Nwauzor was extended to January 8. Your email below states that you need the protective order in place and the class list information before you can provide a notice plan for GEO to consider. Given the upcoming holidays, and given that the government will likely want to weigh in on the protective order and is the only source for certain of the class list information, we think it may not be feasible to have all of this in place so that you can also provide an advance copy of the notice plan with sufficient time for the parties to meet and confer. Are you proposing to further extend that deadline?

Naomi

**Naomi G. Beer**

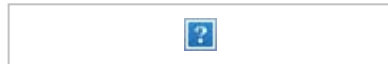
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**From:** Whitehead, Jamal [[mailto:whitehead@sgb-law.com](mailto:mailto:whitehead@sgb-law.com)]

**Sent:** Wednesday, December 12, 2018 10:54 AM

**To:** Beer, Naomi (Shld-Den-LT-Labor-EmpLaw) <[BeerN@gtlaw.com](mailto:BeerN@gtlaw.com)>; [DESmith@littler.com](mailto:DESmith@littler.com); Joan Mell ([joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)) <[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)>

**Cc:** Ellison, Dawn (OfCnsl-DC-LT) <[ellisond@gtlaw.com](mailto:ellisond@gtlaw.com)>; Schipma, Scott A. (Shld-DC-GvtCntr) <[schipmas@gtlaw.com](mailto:schipmas@gtlaw.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [devin@sunbird.law](mailto:devin@sunbird.law); [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [meena@meenamenter.com](mailto:meena@meenamenter.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>

**Subject:** Nwauzor v. GEO - Protective Order

Naomi, et al.:

Some time has passed since we last checked in—if I remember correctly, we were waiting for the Court to enter an updated protective order in *Menocal* before resuming discussions in our case about what a protective order might look like. As you know, a new protective order was entered in *Menocal* on Nov. 30.

We sent Joan a revised protective order on August 28 (see attached), and as best I can tell, that was the last version traded between the parties. Please let us know whether our changes are acceptable and/or if you propose further revisions.

Once we get a protective order in place, and GEO produces some baseline information about

the class (*i.e.*, class list, last known addresses, etc.), we can put together a notice plan in relatively short order.

Let me know if you'd like to schedule a call to discuss any of the above.

Best,  
Jamal

P.S. I'm not sure who to copy as counsel for GEO these days. Please let me know who I should copy on future emails. Thank you.

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**Jamal N. Whitehead**  
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